REMARKS/ARGUMENTS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application is obvious under the provisions of 35 USC § 102. Thus, the Applicants believe that all of these claims are now in allowable form.

If the Examiner believes that there are any unresolved issues in any of the claims now pending in the application, the Examiner is urged to telephone Ms. Alberta A. Vitale, Esq. at (203) 469-8097 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Claim Amendments

Claim 13 is amended to correct a minor typographical error. Claims 4 and 14 are amended in response to the indication that they allowable.

Allowable Subject Matter

The Office action, at page 5, paragraph 3, states that claims 4-10 and 14-20 "are objected to . . . but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claim 4 has been amended to include "all of the limitations of the base claim[s]" 1, 2 and 3. Likewise, claim 14 has been amended to include "all of the

limitations of the base claim[s]" 11, 12 and 13. Hence,
claims 4 and 14 are in allowable form and claims 5-10 and
15-20, which depend from claims 4 and 14, respectively, are
also in allowable form, based upon their dependence from
the allowable base claims.

Rejections under 35 U.S.C. § 102

The Office action has rejected claims 1-3 and
11-13 under the provisions of 35 USC § 102 as being
anticipated over the teachings in the Staples patent
(United States patent 6,301,339 issued to Leven E. Staples
et al. on October 9, 2001 (hereinafter Staples)). This
rejection is respectfully traversed.

Applicants discuss the rejection in the context
of independent claim 1 and dependent claims 2 and 3. The
Office action provides one set of remarks with no
indication as to which claim(s) are discussed. Applicants
note that Claim 1 (apparatus) and claim 11 (method) contain
similar limitations, as do claims 2-3 and 12-13,
respectively. The Office action, paragraph 2, pages 2-4,
recites the rejection of what is presumed, for the sake of
prosecution efficiency, to be claims 1, 2 and 3 (with
citations in parenthesis), as follows:

> Staples et al. discloses method and apparatus for
> providing a web-accessible (fig.18a) virtual
> processing environment to a network-connected office
> server for a remotely connected user computer through
> which a user stationed at the computer can execute

        any of a plurality of server-based applications
        resident at the office server, comprising:
                a platform, capable of being situated in
        network communication between the user computer
        and the office server (fig.1 or 2), having:
                a processor (72);
                a memory (60, 80), connected to the
        processor and for storing computer executable
        instructions therein;
                first and second network interfaces,
                operable in conjunction with the processor,
                for interfacing the platform, through the
                first network interface,
        to a wide area network (WAN) connection through
        which the remote user computer obtains
        connectivity to the platform, and, through the
        second network interface, to a local area network
        (LAN) having a server computer electrically
        communicative thereover, respectively, with the
        server computer forming the office server; and
        wherein, in response to the executable
        instructions, the processor, for each one of the
        server-based applications:
                provides, through a corresponding client
                application module implemented on the
                platform for each of the server-based
                applications, bi-directional protocol
                conversion of messages between the remote
                user computer and the office server, such
                that user interaction data, intended for a
                specific one of the server-based
                applications and provided by a browser
                executing on the remote user computer in a
                first protocol, is converted into a second
                protocol associated with said one server-
                based application and then applied to. the
                server-based application at the office
                server, and output data, provided by said
                specific one server-based application, is
                converted from the second protocol to the
                first protocol for being transmitted to the
                user computer and graphically rendered
                thereat, through the browser, to the user.
                (86, 82, 78, 88; col.29, lines 44-59)

wherein the processor, in response to execution of the
stored instructions: for messages emanating from the
user computer and appearing on the WAN connection:
receives, from the browser, a first message containing
the user interaction data associated with a specific
one server-based application and in the first
protocol; converts the user interaction data in the
first protocol to the second protocol associated with
the specific one server-based application to yield a
second message; and applies the second message, as
input, to the server computer for processing by the
specific one server-based application; and for
messages emanating from the server computer and
appearing on the LAN: receives, from the server
computer and over the LAN connection, a third message
containing output data generated by the specific one
server-based application and in the second protocol;
converts the output data message in the second
protocol to the first protocol to yield a fourth
message; and applies the fourth message to the WAN
connection for transmission to the browser in order to
render the output data thereat. (col.15, line 55-
col. 26, line 30)
wherein the server computer comprises a corresponding
server for each of the serverbased applications and is
implemented either coincident with the platform or as
at   least   one   physical   computer   separate   from   the
platform and connected, via the LAN, to it.
(fig. 12)

The citations are provided within what appears to
be the language of claims 1, 2 and 3. However, the
language is not in quotations and the claim numbers are not
provided. The sparse remarks or citations do not clearly
articulate the rejection as it pertains to each and every
element of the claimed invention (of rejected claims 1-3
and 11-13) as is required by MPEP § 706. It is difficult
to determine how Staples pertains to one or more claim
elements (if any) in the format of the present citation.

Applicants respectfully request that any future rejection including any possible reiteration of the rejection of the Office Action of April 27, 2004, clearly articulate the rejection as it pertains to each and every element of the claimed invention as required by MPEP § 706.

Even assuming for the sake of argument that the rejection is clearly articulated, Applicants respectfully note that Staples fails to teach each and every element of Applicants' claims 1-3 and 11-12.

In the interest of prosecution efficiency, Applicants attempted to determine how the citations could possibly teach each and every element of the claimed invention.

Applicants respectfully request that the Examiner consider that in order to establish a *prima facie* case of anticipation, Staples must teach and every element of Applicants' claimed invention.

Regarding the following portion of the remarks:

> wherein the processor, in response to execution of the stored instructions: for messages emanating from the user computer and appearing on the WAN connection: receives, from the browser, a first message containing the user interaction data associated with a specific one server-based application and in the first protocol; converts the user interaction data in the first protocol to the second protocol associated with the specific one server-based application to yield a second message; and applies the second message, as input, to the server computer for processing by the specific one server-based application; and for

        messages emanating from the server computer and
appearing on the LAN: receives, from the server
computer and over the LAN connection, a third message
containing output data generated by the specific one
server-based application and in the second protocol;
converts the output data message in the second
protocol to the first protocol to yield a fourth
message; and applies the fourth message to the WAN
connection for transmission to the browser in order to
render the output data threat.

The Examiner attempts to imply, by mere citation to Staples
col. 15, line 55 to col. 26, line 30, that this feature of
claim 1 is taught by Staples. No further explanation is
given of the citation to Staples and it is unclear as to
whether the Examiner means to imply that any other feature
of claim 1 is taught by the citation. Applicants have
reviewed the rather lengthy section of Staples and find
that Staples does not provide any teaching or suggestion of
each and every element of Applicants' claim 1, including
Applicants' "WAN connection," "user interaction data" or
"browser" in the context of Applicants' claimed invention.

      For the above stated reasons, Staples does not
teach each and every element of Applicants' claim 1.
Further, Staples does not teach each and every element of
claims 2-3 which depend from claim 1.

      Also, for all of the above stated reasons Staples
does not teach each and every element of Applicants'
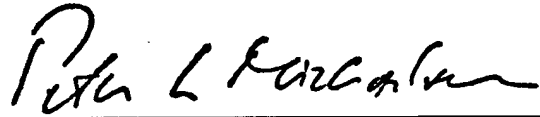claim 11 or claims 12 and 13 which depend from claim 11.

Conclusion

Thus, the Applicants submit that none of the claims, presently in the application, is anticipated under the provisions of 35 USC § 102.

Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

Respectfully submitted,

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